## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

| Ningbo Port Zhonngdi Luggage |             | ) |                              |
|------------------------------|-------------|---|------------------------------|
| Manufacturing Limited        |             | ) |                              |
| _                            |             | ) |                              |
|                              | Plaintiff,  | ) | Case No. 1:24-cv-05031       |
|                              |             | ) |                              |
| v.                           |             | ) | Dist. Judge LaShonda A. Hunt |
|                              |             | ) |                              |
| The Partnerships and         |             | ) | Mag. Judge Young B. Kim.     |
| Unincorporated Associations  |             | ) |                              |
| Identified on Schedule "A",  |             | ) |                              |
|                              |             | ) |                              |
|                              | Defendants. | ) |                              |

## <u>Plaintiff's Motion to Extend the Time of Filing Motion for Entry of Default Judgment</u>

**NOW COMES** Ningbo Port Zhonngdi Luggage Manufacturing Limited ("Plaintiff"), by and through his undersigned counsel, pursuant to Fed. R. Civ. P. 6(b), and seeks to extend the time of filing Motion for Entry of Default Judgment granted.

Federal rules provide that when an act may or must be done within a specified time, the court may, for good cause, extend the time with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires. Fed. R. Civ. P. 6 (b)(1)(A). Plaintiff respectfully submits that such good cause exists to extend the time of filing Motion for Entry of Default Judgment, as a result of the communication between Plaintiff and Defendant No.13 Amijoyping ("Defaulting Defendant"). Defaulting Defendant is trying reaching settlement with Plaintiff. Plaintiff sent Settlement Agreement to Defaulting Defendant on October 30, 2024, but has not received response. Both parties need more time to proceed.

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In light of the foregoing, Plaintiff respectfully requests that the time of filing Motion for Entry of Default Judgment against Defendant Amijoyping extends to November 20, 2024.

Dated: October 31, 2024

Respectfully submitted,

/s/Zhiwei Hua

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ATTORNEY FOR PLAINTIFF